



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

NOV 13 1996

J. Brian Murphy, Treasurer  
Democratic State Committee  
Delaware  
P.O. Box 2065  
Wilmington, DE 19899

Identification Number: C00211763

Reference: 12 Day Pre-Primary Report (7/1/96-8/21/96)

Dear Mr. Murphy:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please be advised that joint fundraising proceeds from a fundraising representative(s), ASDC - DOLLARS FOR DEMOCRATS and DEM STATE PARTY VICTORY FUND, should be reported as a transfer-in on Schedule A supporting Line 12 of the Detailed Summary Page. In addition, using the records received from the fundraising representative, you should itemize gross receipts as contributions from the original donors on a memo Schedule A reporting the date of receipt as the day the fundraising representative received the contribution. 11 CFR §102.17(C)(3)(Ii) and (c)(8)(i)(B). Please amend your report to include memo schedules to support the transfer-in of proceeds from the fundraising representatives.

- Your Schedule H3 discloses a \$654.50 transfer from the non-federal account for a fundraiser called ADMIN; however, ADMIN has not been disclosed on Schedules H2 and H4. Please note that transfers for allocable administrative costs are disclosed on line (i) of Schedule H3. Please amend your report to clarify the discrepancy.

-Schedule H3 of your report discloses transfers received from your non-federal account which occur outside the permissible transfer period. Please be advised that transfers for shared activity must be made within a 70-day time period: no more than 10 days before or 60 days after the payment to the vendor. 11 CFR §§106.5(g)(2) and 106.6(e)(2) Please clarify the nature of these transfers-in from the non-federal account.

The Commission recommends that you immediately transfer the total excessive amount received by your federal account outside the 70-day time period back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

-Please amend your report by providing the election designation for each disbursement itemized on Schedule B supporting Line 23.

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. RENT REIMBURSEMENT should be properly disclosed on a separate Schedule A, supporting Line 15 of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Neil Evans  
Reports Analyst  
Reports Analysis Division

